KLESTADT WINTERS JURELLER SOUTHARD & STEVENS, LLP

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Sean C. Southard Lauren C. Kiss Hearing Date: September 24, 2018 Hearing Time: 1:30 p.m. (EST)

Objection Deadline:

September 17, 2018 at 4:00 p.m. (EST)

Counsel to the Debtor and Debtor-in-Possession

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NEW YORK

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In re : Chapter 11

DOWLING COLLEGE,

f/d/b/a DOWLING INSTITUTE, : Case No. 16-75545 (REG)

f/d/b/a DOWLING COLLEGE ALUMNI : ASSOCIATION, :

ASSOCIATION, : f/d/b/a CECOM, :

a/k/a DOWLING COLLEGE, INC.,

Debtor. :

THE OMNIBUS CLAIMS OBJECTION LISTED BELOW SEEKS TO RECLASSIFY AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. YOU ARE RECEIVING THIS NOTICE BECAUSE YOUR CLAIM IS COVERED BY THE FIRST OBJECTION TO CLAIMS FILED AGAINST THE ESTATE OF DOWLING COLLEGE. YOUR FAILURE TO TIMELY OPPOSE THE RELIEF SOUGHT HEREIN MAY RESULT IN THE GRANTING OF THE RELIEF REQUESTED BY THIS OBJECTION.

ATTACHED TO THE OBJECTION IS A SCHEDULE LISTING EACH CLAIM OBJECTED TO AND THE GROUNDS FOR EACH SUCH OBJECTION. PLEASE REVIEW THE SCHEDULE CAREFULLY WITH RESPECT TO YOUR CLAIM.

NOTICE OF HEARING ON DEBTOR'S FIRST OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM

(Claims that are Incorrectly Classified or Amended or Superseded)

PLEASE TAKE NOTICE that a hearing on the first omnibus objection to certain proofs of claim (the "<u>First Objection</u>")¹ of Dowling College ("<u>Dowling</u>" or the "<u>Debtor</u>"), debtor and debtor-in-possession in the above-captioned chapter 11 case (the "<u>Chapter 11 Case</u>"), for entry of

¹ Terms capitalized but not defined herein shall have the meanings ascribed to them in the First Objection.

an order pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 reclassifying and expunging certain proofs of claim, which are identified on <u>Exhibits A and B</u> to the First Objection, has been scheduled before the Honorable Robert E. Grossman, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Eastern District of New York, Alfonse M. D'Amato Federal Courthouse, 290 Federal Plaza, Courtroom 860, Central Islip, New York 11722 on **September 24, 2018 at 1:30 p.m.** (the "<u>Hearing</u>").

PLEASE TAKE FURTHER NOTICE that responses, if any, to the relief sought in the First Objection shall be made in writing, filed with the Court by registered users of the Court's electronic case filing system and, by all other parties in interest, mailed to the Clerk of the United States Bankruptcy Court, Eastern District of New York, Alfonse M. D'Amato Federal Courthouse, 290 Federal Plaza, Central Islip, New York 11722, on a 3.5 inch floppy disc or compact disc, preferably in Portable Document Format (PDF), Microsoft Word, or any other Windows-based word processing format, and served upon (i) The Office of the United States Trustee for the Eastern District of New York, Alfonse D'Amato Federal Courthouse, 560 Federal Plaza, Central Islip, New York 11722, Attn: Stan Yang, Esq., Trial Attorney; (ii) counsel to the Debtor: Klestadt Winters Jureller Southard & Stevens, LLP, 200 West 41st Street, 17th Floor, New York, New York 10036, Attn: Sean C. Southard, Esq.; (iii) counsel to the Debtor's material prepetition and postpetition secured lenders: (a) Mintz, Levin, Cohn, Ferris, Glovsky, and Popeo, P.C., One Financial Center, Boston, Massachusetts 02111, Attn: P. Miyoko Sato, Esq. and Ian A. Hammel, Esq., (b) White & Case LLP, 1221 Avenue of the Americas, New York, New York 10020, Attn: Brian D. Pfeiffer, Esq., (c) Certilman Balin Adler & Hyman, LLP, 90 Merrick Avenue, 9th Floor, East Meadow, NY 11554, Attn: Richard J. McCord, Esq. and Thomas J. McNamara, Esq., and (d) Garfunkel Wild, P.C., 111 Great Neck Road, Great Neck, NY 11021, Attn: Adam T. Berkowitz, Esq.; and (iv) counsel to the Creditors' Committee: SilvermanAcampora, LLP, 100 Jericho Quadrangle, Suite 300, Jericho, New York 11753, Attn: Ronald J. Friedman, Esq., so as to be received no later than 4:00 p.m. (Prevailing Eastern Time) on September 17, 2018.

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PLEASE TAKE FURTHER NOTICE that the hearing on the First Objection may be adjourned without further notice except as announced in open court at the Hearing, or at any adjourned hearing.

Dated: New York, New York August 21, 2018

KLESTADT WINTERS JURELLER SOUTHARD & STEVENS, LLP

By: /s/ Sean C. Southard

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